



SECRETARIAL COMPLIANCE REPORT OF CMX HOLDINGS LIMITED
(FORMERLY KNOWN AS SIEL FINANCIAL SERVICES LIMITED)
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2022.

To,
CMX Holdings Limited,
4th Floor, Soni Mansion,
12-B Ratlam Kothi,
Indore - 110125 (Madhya Pradesh)

We, Amit R. Dadheech & Associates, Practicing Company Secretary, have examined:

- a) all the documents and records made available to us and explanation provided by **CMX Holdings Limited ("the listed entity")**,
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended March 31, 2022 *("Review Period") in respect of compliance with the provisions of:
 - a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the Company during the financial year under review)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the financial year under review)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the financial year under review)**
- g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the Company during the financial year under review)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and circulars/ guidelines issued thereunder; and based on the above examination,



We hereby report that, during the Review Period:

- a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -

Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
	As per Regulation 23 (9) of LODR Regulations the listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of RPTs on a consolidated basis	Regulation 23 (9) Non-compliance with disclosure of related party transactions on consolidated basis.	*The Company has sent waiver letter to BSE, disclosing that due to mis interpretation of the regulation, Company has not complied with the said regulation. Further the respond from BSE on the said letter is still awaiting.
	Corporate Governance Report under Regulation 27 of SEBI LODR.	Regulation 27(2) Non submission of the Corporate governance compliance report within the period provided under this regulation	*The Company has sent waiver letter to BSE, disclosing that due to mis interpretation of the regulation, Company has not complied with the said regulation. Further the respond from BSE on the said letter is still awaiting.

***The Company has received the mail from BSE on 21/11/2022 and 27/12/2022 for non-compliance of Regulation 27 and 23 (9) of LODR for the Quarter Ended September 2022 and in response to the said mail, the Company has sent waiver letter to BSE.**

Further the respond from BSE on the said letter is still awaiting.

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.

- c) The following are the details of actions taken against the listed entity/ its promoters/directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
	No action taken by either by BSE or by any other regulator during the period under review			

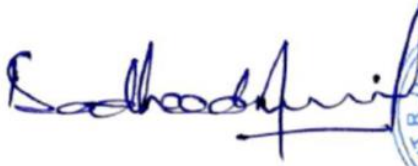

- d) The listed entity has taken the following actions to comply with the observations made in previous reports:



Amit R. Dadheech & Associates
Company Secretaries

Sr. No	Compliance Requirement (Regulations/ guidelines including specific clause) of previous year	Action taken	Pending Requirement (Regulations/ guidelines including specific clause) of previous year	Compliance circulars including specific clause) of previous year
		NA		

For Amit R. Dadheech & Associates

Amit R. Dadheech

Date: 28-03-2023

Place: Mumbai

UDIN: A022889D003332151